

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

Maya Parizer, et al.,

Plaintiffs,

v.

AJP Educational Foundation, et al.,

Defendants.

Case No.1:24-cv-724-RDA-IDD

**MOTION FOR CLERK’S ENTRY OF DEFAULT**  
**AGAINST DEFENDANT ZAREFAH BAROUD**

Plaintiffs Maya Parizer, Adin Gess, Noach Newman, Natalie Sanandaji, Yoni Diller, David Bromberg, Lior Bar Or, Ariel Ein-Gal, and Hagar Almog (collectively, “Plaintiffs”), by and through undersigned counsel, respectfully move the Clerk of this Court for an entry of default against Defendant Zarefah Baroud pursuant to Federal Rule of Civil Procedure 55(a). The factual basis and legal authority for Plaintiffs’ Motion are more fully set forth in the accompanying brief. A declaration in support and proposed entry of default are attached to this Motion.<sup>1</sup>

Dated: September 5, 2024

Respectfully submitted,

*Counsel for Plaintiffs Maya Parizer, Ariel Ein-Gal, Hagar Almog, Adin Gess, Noach Newman, Natalie Sanandaji, Yoni Diller, David Bromberg, and Lior Bar Or*

By: */s/ Jason Torchinsky*  
JASON TORCHINSKY

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<sup>1</sup> Because Defendant Baroud has so far failed to appear and respond, counsel for Plaintiffs have been unable to identify counsel for Defendant Baroud with which to meet and confer pursuant to Local Rule 7(E).

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**Certificate of Service**

I hereby certify that on September 5, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

*/s/ Jason Torchinsky*  
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